

November 6, 2002

Mr. Anthony R. Boothby  
Calciment Blend Corporation  
2070 Hedge Gate Blvd.  
Beavercreek, OH 45431

Mr. David Murphy  
Indianapolis Power and Light  
3700 South Harding Street  
Indianapolis, Indiana 46217

Re: Minor Source Modification No: 097-15342-00033  
Source No.: 097-00033

Dear Sirs:

Calciment Blend Corporation applied for an interim Part 70 Minor Source Modification on April 25, 2002. The Interim Minor Source Modification was issued on May 2, 2002.

As you may know, the Indianapolis Power and Light Company (IPL) Harding Street Station (T097-6566-00033) applied for a Part 70 (Title V) Operating Permit on September 13, 1996. To date, the initial Part 70 Operating Permit for the IPL Harding Street Station has yet to be issued by the Indiana Department of Environmental Management (IDEM), and the City of Indianapolis Office of Environmental Services (OES). Calciment Blend Corporation is collocated with the IPL Harding Station at 4192 South Harding Street, Indianapolis, Indiana. Therefore, the term "source" in the Part 70 documents refers to both the IPL Harding Street Station and Calciment Blend Corporation as one source number 097-00033. The initially assigned for the Calciment Blend Corporation source number 097-00424 has been repealed.

Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction and operation at the source:

- (a) One (1) new lime silo, Emission Unit EU-1, with 190 tons capacity;
- (b) one (1) new fly ash silo, Emission Unit EU-2, with 750 tons capacity;
- (c) two (2) unloading pneumatic conveying systems, for lime and fly ash, Emission Units EU-3 and EU-4, with a capacity of 32 tons per hour each;
- (d) one (1) product loading pneumatic conveying system, Emission Unit EU-5, with a capacity of 75 tons per hour;
- (e) particulate emissions from the silos and pneumatic conveying systems will be controlled by a Baghouse, identified as Control Equipment CE-1, vented to Stack SV-1.

This Minor Source Modification approval will be incorporated into the pending IPL Harding Street Station Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3).

*(Continued on Page 2)*

Calciment Blend Corporation  
Indianapolis, Indiana

Page 2 of 2  
Minor Source Modification No. 097-15342-00033

The Calciment Blend Corporation may begin operation immediately, upon issuance of this Minor Source Modification approval.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.

If you have any questions please call Mr. Boris Gorlin of my staff at (317) 327-2280.

Sincerely,

Original Signed by John B. Chavez  
John B. Chavez  
Administrator

#### Attachments

cc: File  
Compliance - Matt Mosier  
IDEM - Mindy Hahn

BG

**PART 70 MINOR SOURCE MODIFICATION**

**INDIANA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**Calciment Blend Corporation  
at Indianapolis Power and Light Company**

**Harding Street Station  
4192 South Harding Street  
Indianapolis, Indiana 46217**

herein known as the Permittee is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: <b>097-15342-00033</b>	
Issued by: Original Signed by John b. Chavez  John B. Chavez Administrator Indianapolis Office of Environmental Services	Issuance Date: November 6, 2002

## TABLE OF CONTENTS

### **A SOURCE SUMMARY**

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

### **B GENERAL CONSTRUCTION CONDITIONS**

- B.1 Permit No Defense [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Effective Date of the Permit [IC13-15-5-3]
- B.4 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

### **C GENERAL OPERATION CONDITIONS**

- C.1 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]
- C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
- C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- C.4 Opacity [326 IAC 5-1]
- C.5 Operation of Equipment [326 IAC 2-7-6(6)]
- C.6 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.7 Pressure Gauge Specifications [326 IAC 2-7-5(3)(A)(iii)]
- C.8 Compliance Monitoring Plan - Failure to Take Response Steps
- C.9 Emergency Provisions [326 IAC 2-7-16]
- C.10 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]
- C.11 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]
- C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

### **D.1 FACILITY OPERATION CONDITIONS - Two (2) silos EU-1 and EU-2, three (3) Pneumatic Convey Systems EU-3, EU-4, and EU-5, Baghouse CE-1**

**Certification**

**Emergency Occurrence Report**

**Quarterly Report**

## SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Indianapolis Office of Environmental Services (OES). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

---

The Permittee owns and operates a fly ash and lime blending operation facility.

Responsible Official: Mr. Anthony R. Boothby, President  
Source Address: 4192 South Harding Street, Indianapolis, Indiana 46217  
Mailing Address: 2070 Hedge Gate Blvd., Beavercreek, OH 45431  
Phone Number: (937) 320-9383  
SIC Code: 3272  
County Location: Marion County  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program; Minor under PSD Rules

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

---

This stationary source is approved to construct and operate the following emission units and pollution control devices:

- (a) One (1) new lime silo, Emission Unit EU-1, with 190 tons capacity;
- (b) one (1) new fly ash silo, Emission Unit EU-2, with 750 tons capacity;
- (c) two (2) unloading pneumatic conveying systems, for lime and fly ash, Emission Units EU-3 and EU-4, with a capacity of 32 tons per hour each;
- (d) one (1) product loading pneumatic conveying system, Emission Unit EU-5, with a capacity of 75 tons per hour;
- (e) particulate emissions from the silos and pneumatic conveying systems will be controlled by a Baghouse, identified as Control Equipment CE-1, vented to Stack SV-1.

### A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

---

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because it is located at a property of a major source - IPL Harding Street Station (contiguous facilities), a major source, as defined in 326 IAC 2-7-1(22). This modification will be incorporated in the Part 70 Permit of the IPL Harding Street Station, T097-6566-00033, upon its issuance.

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2      Definitions [326 IAC 2-7-1]**

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3      Effective Date of the Permit [IC13-15-5-3]**

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.4      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

## SECTION C GENERAL OPERATION CONDITIONS

### C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) at the beginning of the operation, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services  
2700 South Belmont Avenue,  
Indianapolis, IN 46221

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, and OES upon request and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

### C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services  
2700 South Belmont Avenue,  
Indianapolis, IN 46221

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

#### C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), visible emissions shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

#### C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is are in operation.

### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

#### C.6 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this approval. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015



and

Indianapolis Office of Environmental Services  
2700 South Belmont Avenue,  
Indianapolis, IN 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.7 Pressure Gauge Specifications [326 IAC 2-7-5(3)(A)(iii)]**

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.8 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this approval;
  - (3) The Compliance Monitoring Requirements in Section D of this approval;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAQ and OES upon request and shall be subject to review and approval by IDEM, OAQ and OES. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the

response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

#### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

##### **C.9 Emergency Provisions [326 IAC 2-7-16]**

---

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and OES within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

OES's phone and facsimile numbers:  
Telephone Number: 317-327-2234  
Facsimile Number: 317-327-2274

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Office of Environmental Services  
Air Quality Management Section, Data Compliance  
2700 South Belmont Avenue  
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAQ, and OES may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, and OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

---

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

C.11 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

---

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and Indianapolis Office of Environmental Services may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

---

- (a) Records of all required monitoring data and support information shall be retained for a period of

at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, and Indianapolis Office of Environmental Services representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the OES Administrator makes a written request for records to the Permittee, the Permittee shall furnish the records to the Administrator within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

- (1) The date, place, and time of sampling or measurements;
- (2) The dates analyses were performed;
- (3) The company or entity performing the analyses;
- (4) The analytic techniques or methods used;
- (5) The results of such analyses; and
- (6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

- (1) Copies of all reports required by this approval;
- (2) All original strip chart recordings for continuous monitoring instrumentation;
- (3) All calibration and maintenance records;
- (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
and

Indianapolis Office of Environmental Services  
2700 South Belmont Avenue,  
Indianapolis, IN 46221

- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Indianapolis Office of Environmental Services on or before the date it is due.
- (c) Unless otherwise specified in this approval, any quarterly or semi-annual report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) new lime silo, Emission Unit EU-1, with 190 tons capacity;
- (b) one (1) new fly ash silo, Emission Unit EU-2, with 750 tons capacity;
- (c) two (2) unloading pneumatic conveying systems, for lime and fly ash, Emission Units EU-3 and EU-4, with a capacity of 32 tons per hour each;
- (d) one (1) product loading pneumatic conveying system, Emission Unit EU-5, with a capacity of 75 tons per hour;
- (e) particulate emissions from the silos and pneumatic conveying systems will be controlled by a Baghouse, identified as Control Equipment CE-1, vented to Stack SV-1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Particulate Matter (PM and PM10) [326 IAC 2-7-10.5(d)(5)(E)] and [326 IAC 6-3-2]

- (a) Pursuant to 326 IAC 2-7-10.5(d)(5)(E), the raw material throughput shall be limited to 130,000 tons per 12 consecutive months, rolled on a monthly basis, which is equivalent to PM emissions of 20.2 tons before control per 12 consecutive months and PM10 emissions of 10.3 tons before control per 12 consecutive months.
- (b) Pursuant to 326 IAC 6-3-2(e) (Particulate emission limitations, work practices, and control technologies),
  - (1) PM emission from unloading of lime and fly ash, Emission Units EU-3 and EU-4 each, shall not exceed the allowable PM emission rate of 41.8 lb/hr,
  - (2) PM emission from loading of product, Emission Unit EU-5, shall not exceed the allowable PM emission rate of 74.0 lb/hr.

#### D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section C.2 - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.3 Visible Emissions Notations

- (a) Daily visible emission notations of the Baghouse CE-1 stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the

operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

#### D.1.4 Particulate Matter (PM)

- (a) In order to comply with condition D.1.1(b), the baghouse CE-1 shall be in operation and control emissions from the Emission Units EU-1, EU-2, EU-3, EU-4, and EU-5 at all times when the loading and unloading processes are in operation.
- (b) The Permittee shall record the total static pressure drop across the baghouse CE-1, at least once per day when the loading and unloading processes are in operation. Unless operated under conditions for which the manufacturer specifications and Preventive Maintenance Plan specify otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 to 6.0 inches of water. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.
- (c) The instrument used for determining the pressure shall comply with Condition C.7 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

#### D.1.5 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the loading and unloading operation when venting to the atmosphere. All defective bags shall be replaced.

### **Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### D.1.6 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1(a) and D.1.3, the Permittee shall maintain records of:
  - (1) monthly amount of raw materials throughput (fly ash and lime) in tons;
  - (2) daily visible emission notations.
- (b) All records shall be maintained in accordance with Condition C.12 - General Record Keeping Requirements, of this permit.

#### D.1.7 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with the raw material throughput limit, in accordance with Condition D.1.1 (a), shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).



**OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES  
2700 SOUTH BELMONT AVENUE,  
INDIANAPOLIS, IN 46221**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: Calciment Blend Corporation  
Source Address: 4192 South Harding Street, Indianapolis, Indiana 46217  
Mailing Address: 2070 Hedge Gate Blvd., Beavercreek, OH 45431  
Source Modification No.: 097-15342-00033

**This certification shall be included when submitting monitoring, testing reports/results  
or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**OFFICE OF AIR QUALITY**  
**COMPLIANCE BRANCH**  
100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967  
and  
**Indianapolis Office of Environmental Services**  
**2700 South Belmont Street**  
**Indianapolis, IN 46221**

**PART 70 OPERATING PERMIT**

**EMERGENCY OCCURRENCE REPORT**

Source Name: Calciment Blend Corporation  
Source Address: 4192 South Harding Street, Indianapolis, Indiana 46217  
Mailing Address: 2070 Hedge Gate Blvd., Beaver Creek, OH 45431  
Source Modification No.: 097-15342-00033

**This form consists of 2 pages**

**Page 1 of 2**

- |   |  |
|---|--|
| 9 | This is an emergency as defined in 326 IAC 2-7-1(12)   |
| C | The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and            |
| C | The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16. |

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:

Date/Time Emergency was corrected:

Was the facility being properly operated at the time of the emergency?    Y    N  
Describe:

Type of Pollutants Emitted: TSP, PM-10, SO<sub>2</sub>, VOC, NO<sub>x</sub>, CO, Pb, other:

Estimated amount of pollutant(s) emitted during emergency:

Describe the steps taken to mitigate the problem:

Describe the corrective actions/response steps taken:

Describe the measures taken to minimize emissions:

If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Telephone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES  
Part 70 Source Modification Quarterly Report**

Source Name: Calciment Blend Corporation  
Source Address: 4192 South Harding Street, Indianapolis, Indiana 46217  
Mailing Address: 2070 Hedge Gate Blvd., Beavercreek, OH 45431  
Source Modification No.: 097-15342-00033

Facility: One (1) new lime silo, Emission Unit EU-1, with 190 tons capacity; one (1) new fly ash silo, Emission Unit EU-2, with 750 tons capacity; two (2) unloading pneumatic conveying systems, for lime and fly ash, Emission Units EU-3 and EU-4, with a capacity of 32 tons per hour each; one (1) product loading pneumatic conveying system, Emission Unit EU-5, with a capacity of 75 tons per hour; one (1) Baghouse, Control Equipment CE-1.

Parameters: Material throughput.

Limits: 130,000 tons per 12 consecutive months, rolled monthly, of material (fly ash and lime) throughput, at 0.27 lb PM emission and 0.1377 lb PM10 emission per ton of raw material during unloading operation; 0.04 lb PM emission and 0.02 PM10 emission per ton of product during loading operation.

**Material Throughput**

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month, ton	Previous 11 Months, ton	12 Month Total, ton
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.  
9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**Indiana Department of Environmental Management**  
**Office of Air Quality**  
and  
**Indianapolis Environmental Resources Management Division**

**Technical Support Document (TSD) for a Part 70  
Minor Source Modification**

**Source Background and Description**

<b>Source Name:</b>	Calciment Blend Corporation
<b>Source Location:</b>	4192 South Harding Street, Indianapolis, Indiana 46217
<b>County:</b>	Marion
<b>SIC Code:</b>	3272
<b>Operation Permit No.:</b>	T097-6566-00033
<b>Operation Permit Issuance Date:</b>	Part 70 permit issuance pending
<b>Minor Source Modification No.:</b>	097-15342-00033
<b>Permit Reviewer:</b>	Boris Gorlin

The Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES) have reviewed a modification application from the Calciment Blend Corporation relating to the construction and operation of a fly ash and lime blending and loading operation. The modification consists of the following emission units:

- (a) One (1) new lime silo, Emission Unit EU-1, with 190 tons capacity;
- (b) one (1) new fly ash silo, Emission Unit EU-2, with 750 tons capacity;
- (c) two (2) unloading pneumatic conveying systems, for lime and fly ash, Emission Units EU-3 and EU-4, with a capacity of 32 tons per hour each;
- (d) one (1) product loading pneumatic conveying system, Emission Unit EU-5, with a capacity of 75 tons per hour;
- (e) particulate emissions from the silos and pneumatic conveying systems will be controlled by a Baghouse, identified as Control Equipment CE-1, vented to Stack SV-1.

**Source Definition**

The Calciment Blend Corporation is located on the property of the Indianapolis Power and Light (IPL) Company Harding Street Station (source ID 097-00033); all of the fly ash used by the Calciment Blend Corporation will be generated and supplied by the IPL Harding Street Station. The two sources will share private roads, owned by the IPL Harding Street Station.

Pursuant to 326 IAC 2-7-1(22) and 326 IAC 2-2-1(y), the term "source" in the Part 70 documents will refer to both the Calciment Blend Corporation and the IPL Harding Street Station as one source, because of the support facility relationship. This modification will be incorporated in the pending IPL Harding Street Station Part 70 Permit.

**History**

The Interim Minor Source Modification I-097-15342-00424 for this new construction was issued on May 2, 2002.

Part 70 Permit (T097-6566-00033) for IPL Harding Street Station Application was received on September 13, 1996, and is pending.

This is the first permitting approval for the Calciment Blend Corporation.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
SV-1	Baghouse	10	23	8,280	Ambient

### Recommendation

The staff recommends to the Commissioner that the Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for an Interim Minor Source Modification was received on April 25, 2002. The Interim Minor Source Modification was issued on May 2, 2002. Additional information was received on July 11, 2002 and October 21, 2002.

### Emission Calculations

Section 11.12 of AP-42 (Concrete Batching) provides an uncontrolled PM emission factor for pneumatic unloading of cement of **0.27 lb/ton**. While no emission factor is provided for PM10, Appendix B of AP-42 indicates that the concrete batching should use Category 3 profiles (for particle size fractions). The profile for Category 3 indicates that PM10 is 51% of PM  $0.27 \times 0.51 = \mathbf{0.1377 \text{ lb/ton}}$ . These should provide conservative (high) estimates of pneumatic **unloading** emissions for the materials handled at the Calciment Blend Corporation facility.

EPA's document "AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants" lists a truck **loading** factor of 0.04 lb/T PM, 0.02 lb/T for PM-10 for dry-batch loading (SCC 3-05-011-11). These emission factors more accurately reflect emissions at Calciment Blend Corporation than those of the AP-42 Section 11.12 (Concrete Batching) for pneumatic **unloading** of cement, since the loading of product into sealed trucks will not involve the larger drop heights associated with silos.

Unlimited uncontrolled emission rates based upon the maximum capacity throughput (500 ton/day of raw material unloading and 500 ton/day product loading) will be:

PM:  $500 \text{ ton/day} \times 365 \text{ day/yr} \times (0.27 + 0.04 \text{ lb/ton}) / 2000 \text{ lb/ton} = 28.3 \text{ ton/yr};$

PM10:  $500 \text{ ton/day} \times 365 \text{ day/yr} \times (0.1377 + 0.02 \text{ lb/ton}) / 2000 \text{ lb/ton} = 14.4 \text{ ton/yr}.$

Calciment Blend Corporation accepted an annual raw material throughput limit of 130,000 tons per year, in order to limit the PM uncontrolled PTE to less than 25 tons per year. Uncontrolled potential to emit based upon this limited throughput will be:

PM  $130,000 \text{ ton/yr} \times (0.27 + 0.04) \text{ lb/ton} / 2000 \text{ lb/Ton} = 20.2 \text{ ton/yr}$

PM-10  $130,000 \text{ ton/yr} \times (0.1377 + 0.02) \text{ lb/ton} / 2000 \text{ lb/ton} = 10.3 \text{ ton/yr}$ .

Controlled Emissions (Baghouse CE-1) at the manufacturer guaranteed emission rate of 0.01 gr/dscf and flow rate of 8,280 dscf/min:

PM or PM10:  $0.01 \text{ gr/dscf} \times 8,280 \text{ dscf/min} \times 60 \text{ min/hr} \times 8,760 \text{ hr/yr} / (7,000 \text{ gr/lb} \times 2,000 \text{ lb/ton})$   
= 3.11 ton/yr.

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the USEPA”.

This table reflects the PTE before controls at maximum capacity. Control equipment and usage limits are not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)	
	Before Control	After Control
PM	28.3	3.11
PM-10	14.4	3.11
SO <sub>2</sub>	0	0
VOC	0	0
CO	0	0
NO <sub>x</sub>	0	0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD applicability.

Potential (uncontrolled) emissions from material pneumatic unloading/loading operations were calculated using the AP-42 emission factors for concrete batching (unloading of the raw materials) and “AIRS Facility Subsystem Source Classification Codes and Emission Factor Listing for Criteria Air Pollutants” (loading of the product).

### Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5)(E) as a modification for which the potential to emit of PM before control is limited to less than 25 tons per year by limiting the raw material throughput to 130,000 tons per year.

### County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	maintenance
NO <sub>x</sub>	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.
- (b) Marion County has been classified as attainment, maintenance, or unclassifiable for PM-10, SO<sub>2</sub>, NO<sub>x</sub>, CO, and Pb. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

### Source Status

Existing Source PSD Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	< 100
PM-10	< 100
SO <sub>2</sub>	< 100
VOC	< 100
CO	> 100
NO <sub>x</sub>	> 100

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the 28 listed source categories.
- (b) These emissions are based upon the Part 70 Permit T097-6566-00033.

### Potential to Emit of Modification After Issuance

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.



	Limited Potential to Emit (tons/year)					
Process/facility	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>
Fly Ash and Lime Unloading and Blend Product loading operations	20.2	10.3	0	0	0	0
Significant PSD threshold	25	15	40	40	100	40
PSD Applies (Yes or No)	No	No	No	No	No	No

This modification of an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. For detailed calculations, refer to Appendix A.

#### Federal Rule Applicability

There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

#### State Rule Applicability

##### 326 IAC 1-6-3 (Preventive Maintenance Plans)

This source is subject to 326 IAC 1-6-3 because it is required to obtain a Permit, there are existing applicable requirements, an air control unit (baghouse) will be used, and the PTE is limited. Any person responsible for operating any facility required to obtain a Permit shall prepare and maintain a Preventive Maintenance Plan which includes the following:

- (a) Identification of responsible individuals for inspecting, maintaining and repairing emission control devices.
- (b) Description of items and conditions that will be inspected and an inspection schedule.
- (c) Identification of replacement parts in inventory for quick replacement.

The Preventive Maintenance Plan shall be submitted upon request and subject to review and approval by the OES.

##### 326 IAC 2-4.1-1 (New Source Toxics Control)

Since this modification has no HAP emissions, the requirements of 326 IAC 2-4.1-1 do not apply.

##### 326 IAC 6-1 (Particulate Rules)

Since this source (combination of Calciment Blend Corporation and IPL Harding Street Station) is located in Marion county and has potential PM emissions of less than 100 tons per year or actual emissions of less than 10 tons per year, the requirements of 326 IAC 6-1 do not apply.

**326 IAC 6-3-2 (Particulate emission limitations, work practices, and control technologies)**

Pursuant to 326 IAC 6-3-2(e),

- (a) The Baghouse CE-1 shall be in operation at all times when the blending, loading and unloading processes are in operation;
- (b) PM emission from unloading of lime and fly ash, Emission Units EU-3 and EU-4 each, shall not exceed the allowable PM emission rate, based on formula:

$$E = 4.10P^{0.67} \quad \text{where: } E = \text{rate of emission in pounds per hour,} \\ P = \text{process weight in tons per hour.}$$

$$E = 4.10 \times 32^{0.67} = 41.8 \text{ lb/hr,}$$

which is equivalent to 183.1 ton/yr. This source's potential emissions before control is less than allowable emissions, therefore, this source shall comply with this rule.

- (c) PM emission from loading of product, Emission Unit EU-5, shall not exceed the allowable PM emission rate:

$$E = 4.10 \times 75^{0.67} = 74.0 \text{ lb/hr,}$$

which is equivalent to 324 ton/yr. This source's potential emissions before control is less than allowable emissions, therefore, this source shall comply with this rule.

**326 IAC 2-7-10.5 (Source Modification)**

In order to qualify for a Minor Source Modification, the permittee agreed to limit to less than twenty five (25) tons per year any regulated pollutant other than HAPs, pursuant to 326 IAC 2-7-10.5(d)(5)(E) by limiting the raw material throughput to 130,000 tons per year.

This limit is equivalent to uncontrolled PTE of 20.2 tons per year of PM and 10.3 tons per year of PM10.

**326 IAC 2-6 (Emission Reporting)**

This source (a combination of the IPL Harding Street Station and Calciment Blend Corporation) is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of NOx. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

**326 IAC 8-1-6 (New Source General Emission Reduction Requirements)**

Since this modification has no VOC emissions, the requirements of 326 IAC 8-1-6 do not apply.

**Testing Requirements**

The Permittee is not required, by this permit, to test the Baghouse CE-1. However, IDEM and OES may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM or OES, compliance with the PM or PM-10 limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance

with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs, IDEM, OAQ, and OES, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The Emission Units EU-1, EU-2, EU-3, EU-4, and EU-5 are not subject to an NSPS or NESHAP. However, the units have a device to control emissions; therefore, based on OES and OAQ review, Compliance Monitoring is required for the Baghouse CE-1.

The Calciment Blend Corporation has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emission notations shall be performed during unloading and loading processes. A trained employee shall record whether emissions are normal or abnormal. "Normal" means no visible emissions.
- (b) The Permittee shall record the total static pressure drop across the baghouse CE-1 at least once daily when the loading and unloading pneumatic conveying systems Emission Units EU-3, EU-4, and EU-5 are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 to 6.0 inches of water. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.
- (c) An inspection shall be performed each calendar quarter of all bags controlling the loading and unloading operation when venting to the atmosphere. All defective bags shall be replaced.

These monitoring conditions are necessary because the baghouse CE-1 must operate properly to ensure compliance with 326 IAC 2-7-10.5(d)(5)(E) (Part 70 Permits. Source Modifications). The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

## Conclusion

The operation of the new fly ash and lime blending operation shall be subject to the conditions of the attached Minor Source Modification Permit No. 097-15342-00033.